

EXHIBIT 3

From: David Deal
To: [Weir, Thomas P.](#)
Cc: [Kustina, Emily M.](#); [Brown, Judson](#); [Weeks, Paul J.](#)
Subject: RE: Brammer v. Violent Hues
Date: Friday, March 2, 2018 11:10:34 AM

Tom,

A few things. First, your Notice of Deposition is defective. Without a proper notice, my client is not obligated to be present and will not do so. When my office receives a proper notice that follows the local rules, my suggestion is we speak by telephone to see if we can work things out before I file a Motion for Protective Order.

Thank you,

On March 2, 2018 at 9:00 AM "Weir, Thomas P." <tom.weir@kirkland.com> wrote:

David,

I can assure you that we are not turning this case into our "own personal litigation practice session"; we are zealously representing our client. If you want to file an objection to the notice to depose your client, you are free to do so. We see no basis for such a motion—we are merely asking to depose the plaintiff, the person who initiated this lawsuit and is seeking money damages from our client. And we seek to do so very close to the courthouse where he filed the case. I'm frankly surprised that you find our routine request to depose our client's adversary to be so objectionable, but we're happy to address the issues with the court if that's your preference.

Tom

Thomas P. Weir

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tom.weir@kirkland.com

From: David Deal [mailto:david@daviddeal.com]
Sent: Thursday, March 1, 2018 3:07 PM
To: Weir, Thomas P. <tom.weir@kirkland.com>
Cc: Kustina, Emily M. <emily.kustina@kirkland.com>; Brown, Judson <jdbrown@kirkland.com>; Weeks, Paul J. <paul.weeks@kirkland.com>
Subject: Re: Brammer v. Violent Hues

Tom,

We will be filing an objection to your deposition requests. I am afraid you (not your client) have taken the opportunity to turn this case into your own personal litigation practice session.

I will leave it up to you to explain to the court the need to force my client and his wife to travel to Virginia in order to answer a few questions, especially considering we have made an offer of \$1,800.00 to settle the case.

Good luck with your approach.

On March 1, 2018 at 2:33 PM "Weir, Thomas P."
<tom.weir@kirkland.com> wrote:

David,

Attached please find a deposition notice for Mr. Brammer. We also intend to take the deposition of Mr. Brammer's wife; will you accept service on her behalf so that she does not have to be formally served with a deposition subpoena? If not, please have Mr. Brammer let her know that the subpoena is coming so it is not a surprise.

Thanks,

Tom

Thomas P. Weir

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David

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